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TRANSPORTATION SAFETY EQUIPMENT INSTITUTE
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INSTITUTION
DOCKETS

NHTSA-03-15651-9

2003 SEP -5 P 2:15

September 5, 2003

National Highway Traffic Safety Administration
Docket Management Facility
Room PL-401
400 Seventh Street, SW
Washington, DC 20590-001

Re: Docket No. NHTSA 03-15651; FMVSS 108, Lamps Reflective Devices and Associated Equipment; Draft Interpretations; Request for Extension of Comment Period

Dear Sir or Madam:

The Transportation Safety Equipment Institute (TSEI), which I serve as Executive Director, requests an additional extension of time, until October 31, 2003, to comment on the agency's *Notice of Draft Interpretations* in the docket referenced above.

TSEI, with its offices at 1225 New York Ave., NW, Washington, DC, is a non-profit trade association representing North American manufacturers of vehicle safety equipment, including headlighting and signal lighting products, reflex reflectors, retroreflective conspicuity tape, emergency warning triangles, emergency lighting, rearview mirrors, supplemental information devices, and other safety equipment for truck, trailer, passenger, emergency service and related vehicles.

TSEI agrees with NHTSA's statement in the agency's *Notice of Draft Interpretations* that these matters involve "important novel issues and potentially broad impacts...." For these and related reasons, TSEI and its members have devoted a substantial amount of time and effort to consideration of comments which will attempt to address NHTSA's concerns in a constructive way.

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The Institute's recommendations, which will likely include suggested language to amend Federal Motor Vehicle Safety Standard (FMVSS) 108, cannot be completed until its Fall 2003 membership meeting, which will be held in Washington, D.C. on October 9 and 10. During this meeting, a large portion of time has been reserved for discussion and development of TSEI's position on the agency's draft interpretations by its engineering committee. Thereafter, the Institute expects to complete and submit its comment response.

In order to afford TSEI the opportunity to apply the resources available to it during its October 9-10 meeting to complete work on its response, the Institute and its member constituency of lighting product manufacturers that could be significantly impacted by the draft interpretations request an additional extension of the comment period, until October 31, 2003.

Respectfully submitted,

A handwritten signature in black ink, reading "Ann M. McCulloch". The signature is fluid and cursive, with a large, stylized "M" and "C".

Ann McCulloch
Executive Director
Transportation Safety Equipment Institute